

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. CHARLESTON BLVD.  
LAS VEGAS, NV 89135  
TELEPHONE: 702.369.6800

Anthony L. Martin  
Nevada Bar No. 8177  
[anthony.martin@ogletreedeakins.com](mailto:anthony.martin@ogletreedeakins.com)  
Noel M. Hernandez  
Nevada Bar No. 13893  
[noel.hernandez@ogletreedeakins.com](mailto:noel.hernandez@ogletreedeakins.com)  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. Charleston Blvd.  
Suite 500  
Las Vegas, NV 89135  
Telephone: 702.369.6800  
Fax: 702.369.6888  
*Attorneys for Defendant Sunrise Hospital and  
Medical Center, LLC*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

LAKISHA LEWIS,

Plaintiff,

vs.

SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC, a Delaware Limited Liability  
Company; DOES I-X; and, ROE Business  
Entities I-X,

Defendants.

Case No.: 2:21-cv-00464-CDS-VCF

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTIONS  
AND RESPONSES THERETO**

**(SPECIAL REVIEW REQUESTED)  
(FIRST REQUEST)**

Plaintiff Lakisha Lewis (“Plaintiff”) and Defendant Sunrise Hospital and Medical Center, LLC (“Defendant”) (collectively, when possible, “the Parties”), by and through their respective counsel, hereby stipulate and agree to extend the time for the Parties to file dispositive motions in this action. Pursuant to the Court’s Order of May 31, 2022 Order (ECF 24), the current deadline for filing dispositive motions is Monday, September 12, 2022. Having taken the deposition of Plaintiff Lakisha Lewis on August 15, 2022, the parties have completed all discovery in this case. Good cause exists for the proposed extension of time to file and respond to dispositive motions. The Parties previously filed three requests to extend discovery deadlines and this is the Parties’ first request to extend the dispositive motion deadline.

**I. REASONS TO EXTEND THE DISPOSITIVE MOTION DEADLINE**

The extension is necessary, given the current briefing schedule for dispositive motions. The Parties conducted the deposition of Plaintiff Lakisha Lewis on August 15, 2022. The Plaintiff has thirty (30) days from the date of receipt of her deposition transcript to review and make any changes to the transcript. Currently, the deadline to file dispositive motions is September 12, 2022. This will leave little, to perhaps no time to incorporate Plaintiff's deposition testimony into dispositive motions. Taking the time for deposition transcript preparation, and the review of said deposition transcript into account, the Parties have agreed to extend the dispositive motion deadline and have agreed to a proposed briefing schedule:

Based on the foregoing, the Parties have agreed that the dispositive motion deadlines should be extended in the following manner:

- Defendant shall file its dispositive motion no later than **Monday, December 12, 2022**;
- Plaintiff will file her opposition no later than **Wednesday, January 11, <sup>2023</sup>~~2022~~**; and
- Defendant shall file its reply no later than **Friday, February 10, <sup>2023</sup>~~2022~~**.

///

///

///

///

///

///

///

///

///

///

///

///

///

///

**IT IS SO STIPULATED.**

DATED this 23<sup>rd</sup> day of August, 2022.

KEMP & KEMP, ATTORNEYS AT LAW

/s/ James P. Kemp

James P. Kemp, Esq.  
Nevada Bar No. 006375  
7435 W. Azure Drive, Ste. 110  
Las Vegas, NV 89130  
*Attorney for Plaintiff*

DATED this 23<sup>rd</sup> day of August, 2022.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

/s/ Noel M. Hernandez

Anthony L. Martin  
Nevada Bar No. 8177  
Noel M. Hernandez  
Nevada Bar No. 13893  
10801 W. Charleston Blvd.  
Suite 500  
Las Vegas, NV 89135  
*Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

August 23, 2022

DATE